

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
V.)	CASE NO: 1:07-CR-60-WKW
)	
JAMES ALLAN GIBSON)	

UNOPPOSED MOTION TO CONTINUE TRIAL

NOW COMES the Defendant, by and through the undersigned counsel and pursuant to 18 U.S.C. § 3161 (h), and respectfully moves this Court to move this matter for trial from the August, 2007 trial docket.

In support of this Motion, defendant would state that a continuance is needed to permit the parties to conduct negotiation of a possible resolution of this case, based on the following circumstances:

1. Counsel for the prosecution does not oppose this motion.
2. The Indictment in this case charges Mr. Gibson with being a felon in possession of a firearm, on an occasion in January 2007 in Dale County, Alabama.
3. The Indictment alleges that Mr. Gibson has one prior felony conviction, from 1993.
4. Mr. Gibson has authorized counsel to participate in settlement negotiations.
5. Both parties require additional information, in order to continue plea negotiations; therefore, additional time is sought to gain that information and continue negotiations.

WHEREFORE, defendant respectfully requests that this Motion be granted.

Respectfully submitted,

s/Christine A. Freeman
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CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: Assistant United States Attorney, 131 Clayton Street, Montgomery, AL 36101.

s/Christine A. Freeman
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